

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

LYNNE FREEMAN,

Plaintiff,

v.

TRACY DEEBS-ELKENANEY P/K/A
TRACY WOLFF, et al.,

Defendants.

Case No.: 1:22-cv-02435-LLS-SN

DECLARATION OF BENJAMIN S. HALPERIN

Benjamin S. Halperin declares as follows:

1. I am Counsel with Cowan, DeBaets, Abrahams, & Sheppard LLP, attorneys for defendants Tracy Deebs-Elkenaney p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrinck Publishers, LLC d/b/a MacMillan, and Universal City Studios LLC (collectively, the “Entangled Defendant”), in the above-captioned matter. I make this declaration in support of the Entangled Defendants’ and defendants Emily Sylvan Kim’s and Prospect Agency, LLC’s Response to Plaintiff Lynne Freeman’s February 27, 2023 letter (ECF No. 139).

2. Attached hereto as Exhibit A is a true and correct copy of an email chain from February 22, 2023 to February 23, 2023 between Plaintiff’s counsel and Defendants’ counsel discussing text message redactions.

3. Attached hereto as Exhibit B is a true and correct copy of an email chain from January 17, 2023 to February 16, 2023 between Plaintiff’s counsel and Defendants’ counsel discussing deposition scheduling.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 2, 2023
New York, New York

A handwritten signature in black ink, appearing to read 'B. Halperin', with a long horizontal flourish extending to the right.

Benjamin S. Halperin